

Captain Don Keeler

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May 16, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

6004 '99 MAY 24 AM 12:22

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food":

I know Congress did not authorize you to require a large label, but please ask Congress to authorize a label large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

Otherwise, the FDA should retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods. In its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of food, and should be disclosed. The material fact remains; therefore, labeling should remain. Storage qualities, nutrients, and consumer acceptability are affected. Some foods have different texture and spoilage characteristics after irradiation. Most fruits and vegetables have nutrient losses that are not obvious or expected by consumers. Nutrition labels on irradiated foods should reflect nutrient losses, listing nutrients that remain after treatment.

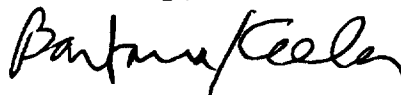
In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested. Labels should alert consumers to the possible presence of these substances.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food.

Labels are important for consumers who do believe in irradiation as a good solution to dangers of food-borne illness. The labels will help them find the irradiated foods. Likewise, they allow other consumers to decline irradiated foods and rely on judicious food-handling procedures and buy from suppliers they trust to do likewise.

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

Sincerely,



Barbara Keeler

cc Senator

Boxer

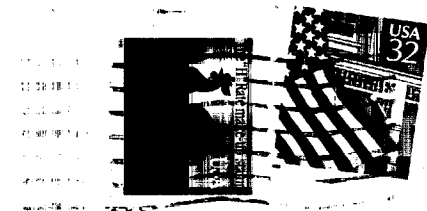
Senator Feinstein

Congressman Kuykendall

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